

Privacy Policy – Civil Independence Industries Pty Ltd ACN 621 542 881

Last updated on 20 May 2026

1. General

- 1.1 Civil Independence Industries ACN 621 542 881 and its related entities (**Civil Independence Industries, we, us, our**) is committed to protecting your privacy and complying with its obligations under the *Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles (**APPs**) and other privacy laws that may apply in respect of collecting personal information.
- 1.2 This Privacy Policy is subject to change at our discretion, and we will update it from time to time. The current version will always be available on our website at <http://www.civilind.com.au> (**Website**). If we change this Privacy Policy in any material way, we will post a notice on our Website (as relevant) along with the updated Privacy Policy.
- 1.3 In this Privacy Policy, we use the terms:
 - (a) 'clients' to refer to individuals who engage us to provide goods and services, and individuals at businesses who engage us to provide goods and services;
 - (b) 'suppliers' to refer to individuals who provide us with goods or services, and individuals at businesses who provide us with goods or services;
 - (c) 'visitors' to refer to individuals who engage with us on our Website, or who enquire about our functions or activities via electronic means;
 - (d) 'applicants' to refer to individuals who apply for employment or other engagement with us.
- 1.4 In some circumstances, you may belong to more than one of these groups, and multiple sections of this Privacy Policy will then apply to you.

2. What personal information do we collect?

- 2.1 The kinds of personal information we collect about you depends on our relationship with you, and we limit the information we collect to what is reasonably necessary for one or more of our functions or activities. Generally, we will collect your name, commentary or opinion about you, and other information relevant to providing you with the information, goods and services (as applicable) you or someone on your behalf are seeking.
- 2.2 If you are a client, we will also collect your contact details, business name, ABN (for sole traders and partnerships), information about your role, marketing and communications preferences, and information related to your Website interactions with us.
- 2.3 If you are a supplier, we will also collect your contact details, ABN (for sole traders and partnerships), business name, bank account details (for payment of your invoices), and information about your role.
- 2.4 If you are a visitor, we will also collect your email address, information about your use of our Website and the device you are using (including numbers that identify your device, IP address, geographic location of your IP address and device where that is relevant to the services and information we are providing, cookie information, and user preferences). You may choose to enable or disable information you share with us via the website in your browser or device settings. Disabling the sharing of some information may affect your ability to use certain features of the website, and your visitor experience generally.
- 2.5 If you are an applicant, depending on your potential or actual position with us, we will also generally collect your personal information contained within an application and CV/resume, employment history,

personal information derived from a reference, personal information derived from an interview, personal information derived through testing (including psychometric or aptitude testing, as applicable), licences and other certificates and qualifications, and information included in a passport, birth certificate, visa or other documentation demonstrating your right to work in Australia.

- 2.6 We support your ability to make decisions about the personal information you provide to us, however if you choose not to provide us with the information requested, or it's incomplete or inaccurate, we may not be able to provide you with the information, goods, and services you are seeking. If you are an applicant, refusal to provide personal information may mean we are unable to process your application.

3. How we collect your personal information

- 3.1 We will generally collect personal information directly from you when you interact with us, such as in person, by email, by phone, by enquiry or feedback form, or via our Website, social media channels, interviews (via any method), any of our standard forms (including application forms), contract negotiation, our employment and engagement application process, our surveys (where applicable), or any other means when you provide us with your personal information.
- 3.2 We may also need to collect personal information about you from third parties from time to time where it is necessary for us to do so and it is unreasonable or impractical to collect directly from you, where you have consented to us doing so, or where we are otherwise required to or authorised to by law. Those third parties include:
- (a) if you are a client or supplier: publicly available records such as the Australian Securities Investment Commission, and Australian Business Register;
 - (b) if you are a visitor: technology service providers and social media platforms;
 - (c) if you are an applicant: referees when they provide references, academic institutions or training and certification providers, providers of licence and background-checking services, recruiters and other service providers who assist in the engagement process, and other publicly available sources such as social media platforms.
- 3.3 Except as otherwise permitted by law, we only collect sensitive information about you if you consent to the collection of the information and if it is reasonably necessary for the performance of our functions and activities. Consent may be implied by the circumstances existing at the time of collection. There may also be circumstances under which we may collect sensitive information without your consent, as required or authorised by law.
- 3.4 If you provide us with personal information about someone else, you must ensure that you are authorised to disclose that information to us and that, without us taking any further steps required by applicable privacy laws, we may collect, store, use and disclose such information for the purposes described in this Privacy Policy. Where we request you to do so, you must assist us with any requests by the individual to access or update the personal information you have collected from them and provided to us.

4. Why do we collect, hold, use and disclose your personal information?

- 4.1 We will generally collect, hold, use, and disclose your personal information if it is reasonably necessary for or directly related to the performance of our functions and activities and:
- (a) to facilitate our internal business operations, including:
 - (i) establishing our relationship with you;
 - (ii) maintaining and managing our relationship with you, and communicating with you in the ordinary course of that relationship;
 - (iii) supplying you with information, goods and services;

- (iv) updating your personal information, including destroying or de-identifying it when it is no longer relevant (to the extent applicable);
 - (v) fulfilling our legal requirements, both at law and under our contractual arrangements with you;
 - (vi) analysing our goods and services, and client and supplier needs with a view to developing new or improved goods, services, and business operations;
 - (vii) conducting market research and monitoring use of our goods and services;
 - (viii) contacting you to ask for your feedback or a testimonial;
 - (ix) if you are a supplier: purchasing goods or services from you, and enquiring about your products and services;
 - (x) if you are a visitor or client: streamlining and personalising your experience within our Website, and tailoring our information, goods and services for you; and
 - (xi) if you are an applicant, considering your application with us.
- (b) to de-identify and aggregate personal information about you and your use of our goods and services to improve the quality of our goods and services, and for research purposes. After we delete personal information, we may retain de-identified and anonymised information (that can no longer be associated with you) and may continue to use this de-identified data indefinitely without further notice to you; and
- (c) for any other purpose identified at the time of collection.

4.2 We may use or disclose personal information for secondary purposes where it would be reasonable to expect us to do so, and that secondary purpose is related (or directly related in the case of sensitive information) to the primary purpose set out above.

5. Who we disclose personal information to

- 5.1 We generally disclose your personal information for the purposes for which it was collected (set out above). We may disclose personal information about you to:
- (a) our related entities;
 - (b) our employees, contractors, consultants and other parties who require the information to assist us with the purposes for which it was collected, and with establishing, maintaining or terminating our relationship with you;
 - (c) government departments and agencies where required by law;
 - (d) third party service providers who assist us in operating our business and providing information, resources, goods and services to you or someone else on your behalf (including insurers, IT and technology service providers, recruitment providers, and professional advisers such as lawyers, accountants, and auditors);
 - (e) third parties to whom you have agreed we may disclose your information and where the information was collected from you (or from a third party on your behalf) for the purposes of passing it on to the third party; and
 - (f) any other entity as otherwise required or authorised by law, including regulatory bodies.
- 5.2 We may expand or reduce our business, and this may involve the sale and/or transfer of control of all or part of our business. Personal information, where it is relevant to any part of the business for sale and/or transfer, may be disclosed to a proposed new owner or newly controlling entity for their due diligence

purposes, and upon completion of a sale or transfer, will be transferred to the new owner or newly controlling party to be used for the purposes for which it was provided.

6. Direct marketing

- 6.1 We may use your personal information (excluding any sensitive information) to send you direct marketing communications and information about our goods and services via mail or email with your consent (which may be implied in some circumstances).
- 6.2 If you do not provide your consent to receive direct marketing communications, you may opt-out of receiving marketing communications from us by contacting us at the details below or by using the opt-out facilities provided in our communications.
- 6.3 We do not provide your personal information to other organisations for the purposes of their direct marketing and will not sell, rent, or lease our customer lists to third parties. Our practices in regard to our emails are designed to be compliant with anti-spam laws, including Australia's *Spam Act 2003* (Cth) and the *Do Not Call Register Act 2006* (Cth). If you believe you have received mail in violation of these laws or any other anti-spam law, please contact us using the contact information in this Privacy Policy.

7. Overseas disclosure

- 7.1 We are assisted by a variety of external service providers to operate our business and to provide you or someone else on your behalf with the information and services sought. Some of these service providers may be located overseas, and while there are too many to name, they include, Microsoft, Xero, Google and Meta located in the USA.
- 7.2 We take reasonable steps to ensure these service providers have appropriate security for your personal information and use it only for the purposes for which it was collected.

8. How we store and protect personal information

- 8.1 We store your personal information in different ways, including in paper and electronic form. We take all reasonable measures to ensure your personal information is stored on secure servers (which may be based in Australia or overseas) in a manner that reasonably protects it from interference, misuse and loss and from unauthorised access, modification or disclosure, including electronic and physical security measures, including:
 - (a) limiting access to the personal information we collect about you;
 - (b) only providing access to personal information once proper identification has been given; and
 - (c) requiring third party providers to have acceptable security measures to keep personal information secure.
- 8.2 When we no longer need your personal information for the purpose for which we collected it, we will take reasonable steps to destroy or permanently de-identify your personal information (unless legislation requires us to destroy or permanently de-identify it sooner).
- 8.3 Despite the reasonable steps we take to secure your personal information, if you provide any personal information to us via our Website (including email) or if we provide personal information to you by such means, the privacy, security and integrity of your personal information cannot be guaranteed during its transmission unless we have indicated beforehand that a particular transaction or transmission of information will be protected (for example, by encryption).

9. Accessing or correcting your personal information

- 9.1 You may access the personal information we hold about you, subject to certain exceptions. If you wish to access your personal information, please contact us at admin@civilind.com.au.
- 9.2 There are no charges for requesting access to or the correction of your personal information, however we reserve our rights to charge you any reasonable administration fees associated with your request. We will notify you in advance of any applicable fees.
- 9.3 We endeavour to respond to those requests within 30 days, but will otherwise respond within a reasonable period. We may decline a request for access to personal information in circumstances prescribed by the Privacy Act. If we decline a request for access, where reasonable, we will provide you our reasons and information about your ability to complain about such refusal.
- 9.4 In order to protect the confidentiality of your personal information, details of your information will only ever be passed on to you where we are satisfied that the information relates to you. Accordingly, we may request documentation from you which confirms your identity before passing on any personal information which relates to you.
- 9.5 If you believe the personal information we hold about you is incomplete, not up to date, or is inaccurate, please advise us as soon as practicable. We will take reasonable steps to correct the information if we agree that it is incomplete, out of date, or inaccurate. We will strive to process any request within 30 days.

10. Making a complaint

- 10.1 Complaints about our Privacy Policy or the way we handle your personal information should first be directed to us at the details set out above.
- 10.2 We will investigate and attempt to resolve your complaint in accordance with the Privacy Act. If you are not satisfied with the outcome of this process, then you may contact the Office of the Information Commissioner, Australia. To lodge a complaint, visit the 'Complaints' section of the Information Commissioner's website, located at <http://www.oaic.gov.au/privacy/privacy-complaints>, to obtain the relevant complaint forms, or contact the Information Commissioner's office.

11. Further information

- 11.1 If you require any further information or have any queries regarding our Privacy Policy, please contact our Privacy Officer at the details set out above.
- 11.2 Should you wish to read more information on the Privacy Act, we recommend that you visit the website of the OAIC at www.oaic.gov.au.